

Exhibit B

From: [Bogni, Sarah \(USATNM\)](#)
To: [Ronald Chapman II](#); [Meggan B. Sullivan](#)
Cc: [Stephanie Angelo](#); [Aldridge, Juliet \(USATNM\)](#)
Subject: RE: Activity in Case 2:19-cr-00010 USA v. Ghearing Order
Date: Thursday, February 2, 2023 3:52:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Sounds like you guys have a few more conflicts to work out – how about you all file an unopposed notice and can represent that we are available to try it when convenient for the Court and Defense (but would prefer before September).

Sarah

From: Ronald Chapman II <rwchapman@chapmanlawgroup.com>
Sent: Thursday, February 2, 2023 3:47 PM
To: Meggan B. Sullivan <msullivan@chapmanlawgroup.com>; Bogni, Sarah (USATNM) <sbogni@usa.doj.gov>
Cc: Stephanie Angelo <sangelo@chapmanlawgroup.com>; Aldridge, Juliet (USATNM) <jaldridge1@usa.doj.gov>
Subject: [EXTERNAL] Re: Activity in Case 2:19-cr-00010 USA v. Ghearing Order

Yes I have an April 5 trial that will go three weeks and a May 1 trial that will go four weeks.

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From: Meggan B. Sullivan <msullivan@chapmanlawgroup.com>
Sent: Thursday, February 2, 2023 4:36:54 PM
To: Ronald Chapman II <rwchapman@chapmanlawgroup.com>; Bogni, Sarah (USATNM) <Sarah.Bogni@usdoj.gov>
Cc: Stephanie Angelo <sangelo@chapmanlawgroup.com>; Aldridge, Juliet (USATNM) <Juliet.Aldridge2@usdoj.gov>
Subject: Re: Activity in Case 2:19-cr-00010 USA v. Ghearing Order

Juliet will have the Morales trial Sept- November. Angie said Campbell could do late March into April but I think Ron has May 1 trial

Maybe a call is more productive? I'm in a change of plea at the moment

MEGGAN BESS SULLIVAN | Of Counsel
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From: Ronald Chapman II <rwchapman@chapmanlawgroup.com>
Sent: Thursday, February 2, 2023 3:34:10 PM
To: Meggan B. Sullivan <msullivan@chapmanlawgroup.com>; Bogni, Sarah (USATNM) <Sarah.Bogni@usdoj.gov>
Cc: Stephanie Angelo <sangelo@chapmanlawgroup.com>; Aldridge, Juliet (USATNM) <Juliet.Aldridge2@usdoj.gov>
Subject: Re: Activity in Case 2:19-cr-00010 USA v. Ghearing Order

I have a trial in July. How does September look?

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From: Meggan B. Sullivan <msullivan@chapmanlawgroup.com>
Sent: Thursday, February 2, 2023 4:33:25 PM
To: Bogni, Sarah (USATNM) <Sarah.Bogni@usdoj.gov>; Ronald Chapman II <rwchapman@chapmanlawgroup.com>
Cc: Stephanie Angelo <sangelo@chapmanlawgroup.com>; Aldridge, Juliet (USATNM) <Juliet.Aldridge2@usdoj.gov>
Subject: Re: Activity in Case 2:19-cr-00010 USA v. Ghearing Order

I cannot do June unless we start last week of June and go into July

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From: Bogni, Sarah (USATNM) <Sarah.Bogni@usdoj.gov>
Sent: Thursday, February 2, 2023 3:32:05 PM
To: Ronald Chapman II <rwchapman@chapmanlawgroup.com>; Meggan B. Sullivan <msullivan@chapmanlawgroup.com>
Cc: Stephanie Angelo <sangelo@chapmanlawgroup.com>; Aldridge, Juliet (USATNM) <Juliet.Aldridge2@usdoj.gov>
Subject: RE: Activity in Case 2:19-cr-00010 USA v. Ghearing Order

Just following up so we can get something jointly on file. I know Juliet and Meggan were in a sentencing on Morales Rodriguez. Are we good with this joint suggestion?

Sarah

From: Bogni, Sarah (USATNM)
Sent: Thursday, February 2, 2023 12:51 PM
To: Ronald Chapman II <rwchapman@chapmanlawgroup.com>; Meggan B. Sullivan <msullivan@chapmanlawgroup.com>
Cc: Stephanie Angelo <sangelo@chapmanlawgroup.com>; Aldridge, Juliet (USATNM) <jaldridge1@usa.doj.gov>
Subject: RE: Activity in Case 2:19-cr-00010 USA v. Ghearing Order

June works for Juliet and I as well. Shall I suggest June, after June 5, and predicted to go 4 weeks? Hopefully we can squeeze the proof down a little if we can reach agreement on some stipulations in advance, but best to be safe.

Sarah

From: Ronald Chapman II <rwchapman@chapmanlawgroup.com>
Sent: Thursday, February 2, 2023 12:42 PM
To: Bogni, Sarah (USATNM) <sbogni@usa.doj.gov>; Meggan B. Sullivan <msullivan@chapmanlawgroup.com>
Cc: Stephanie Angelo <sangelo@chapmanlawgroup.com>; Aldridge, Juliet (USATNM) <jaldridge1@usa.doj.gov>
Subject: [EXTERNAL] RE: Activity in Case 2:19-cr-00010 USA v. Ghearing Order

The month of June is pretty open for me. I finish a May trial that will go until June 5th. But we could start after that. Hopefully we can finish up by the 4th of July.

Other than that, September is open for me.

RONALD W. CHAPMAN II LL.M. | Shareholder, Chair-White Collar Defense & Government Investigations

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Author of: *"Unraveling Federal Criminal Investigations"* | [Read Now](#)



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From: Bogni, Sarah (USATNM) <Sarah.Bogni@usdoj.gov>

Sent: Thursday, February 2, 2023 1:33 PM

To: Ronald Chapman II <rwchapman@chapmanlawgroup.com>; Meggan B. Sullivan <msullivan@chapmanlawgroup.com>

Cc: Stephanie Angelo <sangelo@chapmanlawgroup.com>; Aldridge, Juliet (USATNM) <Juliet.Aldridge2@usdoj.gov>

Subject: RE: Activity in Case 2:19-cr-00010 USA v. Ghearing Order

I think Juliet and I have more open time than you guys do (at least until September – Juliet has a multi month trial set and I have a trial set as well that I hope to hold to that date). As a result we can be pretty flexible over the next several months, but I heard you guys tick off a few trials on your calendars. I wasn't 100% sure on where the clock is at based on the Court's comments, but between late March and maybe mid-July would be great if there is a time in that window that we can fit it in? What do you guys think?

Sarah

From: Ronald Chapman II <rwchapman@chapmanlawgroup.com>

Sent: Thursday, February 2, 2023 5:36 AM

To: Bogni, Sarah (USATNM) <sbogni@usa.doj.gov>; Meggan B. Sullivan <msullivan@chapmanlawgroup.com>

Cc: Stephanie Angelo <sangelo@chapmanlawgroup.com>; Aldridge, Juliet (USATNM) <jaldridge1@usa.doj.gov>

Subject: [EXTERNAL] Re: Activity in Case 2:19-cr-00010 USA v. Ghearing Order

I'm ok with a Joint Notice. What dates do you have in mind?

From: Bogni, Sarah (USATNM) <Sarah.Bogni@usdoj.gov>
Date: Wednesday, February 1, 2023 at 6:18 PM
To: Meggan B. Sullivan <msullivan@chapmanlawgroup.com>, Ronald Chapman II <rwchapman@chapmanlawgroup.com>
Cc: Stephanie Angelo <sangelo@chapmanlawgroup.com>, Aldridge, Juliet (USATNM) <Juliet.Aldridge2@usdoj.gov>
Subject: FW: Activity in Case 2:19-cr-00010 USA v. Ghearing Order

Meggan and Ron,

The Court's Order is a little unclear on whether he wants a joint notice of proposed dates. Would you like to file one together or do you intend to file your own?

Thanks,
Sarah

From: cmecf@tnmd.uscourts.gov <cmecf@tnmd.uscourts.gov>
Sent: Tuesday, January 31, 2023 12:55 PM
To: deadmail@tnmd.uscourts.gov
Subject: Activity in Case 2:19-cr-00010 USA v. Ghearing Order

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U.S. District Court

Middle District of Tennessee

Notice of Electronic Filing

The following transaction was entered on 1/31/2023 at 12:55 PM CST and filed on 1/31/2023

Case Name: USA v. Ghearing
Case Number: 2:19-cr-00010
Filer:
Document Number: 179

Docket Text:
ORDER as to Gilbert R. Ghearing: The Court held a status conference on January

30, 2023, to discuss the status of the case and trial dates. On or before February 2, 2023, the parties shall file a notice of proposed trial dates. Signed by District Judge William L. Campbell, Jr on 1/31/2023. (dt)

2:19-cr-00010-1 Notice has been electronically mailed to:

Sarah K. Bogni sarah.bogni@usdoj.gov, CaseView.ECF@usdoj.gov, alice.cross@usdoj.gov,
diane.thompson@usdoj.gov, jessica.l.green@usdoj.gov, john.hernandez@usdoj.gov,
vanessa.quant@usdoj.gov

Meggan B. Sullivan msullivan@chapmanlawgroup.com, peggy.sheppard.cja@gmail.com

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sambrose@chapmanlawgroup.com, sangelo@chapmanlawgroup.com

2:19-cr-00010-1 Notice SHOULD be delivered by other means to:

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Original filename:n/a

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7789b8dddc3d7bac5b43f4648b1cc117bd82a564f98e976da6ca700fdaf15]]